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9 UNITED STATES DISTRICT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

4:15-CR-6049-EFS

12 Plaintiff,

SECOND SUPERSEDING
INDICTMENT

13 vs.

14 Vio: 21 U.S.C. § 846
15 Conspiracy to Distribute 500
16 Grams or More of a Mixture or
17 Substance Containing a
18 Detectable Amount of
19 Methamphetamine, 5 Kilograms
20 or More of Cocaine, 1 Kilogram
21 or More of Heroin and 400 grams
22 or More of N-phenyl-N
Propanamide
(Count 1)

23 ADAM BENJAMIN GOLDRING,

24 Vio: 18 U.S.C. § 1956(h)
25 Conspiracy to Commit Money
26 Laundering (Count 2)

27 Vio: 21 U.S.C. § 841(a)(1),
28 (b)(1)(A)(ii)
Possession with the Intent to
Distribute 5 Kilograms or more of
Cocaine (Count 3)

SECOND SUPERSEDING INDICTMENT – 1

Second Superseding Indictment.docx

Vio: 18 U.S.C. § 1956(a)(1)(B)(i)
Money Laundering
(Counts 4, 5, 6, 7, 10, 11, 12, 14)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with the Intent to
Distribute 50 grams or more of
Actual Methamphetamine
(Count 8)

Vio: 18 U.S.C. 1956(a)(1)(B)(i)
International Money Laundering
(Counts 9, 13)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(i), (vi)
Possession with the Intent to
Distribute 1 Kilogram or More of
a Mixture or Substance
Containing Heroin and
400 grams or More of a Mixture
or Substance Containing N-
phenyl-N Propanamide
(Count 15)

Notice of Criminal Forfeiture
Allegations

Defendants.

The Grand Jury Charges:

COUNT ONE

Beginning on a date unknown but by on or about January 2010 continuing
until on or about December 6, 2016, in the Eastern District of Washington and
elsewhere, the Defendants, [REDACTED]

SECOND SUPERSEDING INDICTMENT – 2

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED], ADAM BENJAMIN GOLDRING, [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED],
15 did knowingly and intentionally combine, conspire, confederate and agree together
16 with each other and other persons, both known and unknown to the Grand Jury, to
17 commit the following offense against the United States, to wit: distribution of 500
18 grams or more of a mixture or substance containing a detectable amount of
19 Methamphetamine, 5 kilograms or more of a mixture or substance containing a
20 detectable amount of Cocaine, 1 kilograms or more of a mixture or substance
21 containing a detectable amount of heroin and 400 grams or more of a mixture or
22 substance containing a detectable amount of N-phenyl-N Propanamide, all
23 Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1),
24 (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in violation of 21 U.S.C. § 846.
25
26
27
28

SECOND SUPERSEDING INDICTMENT – 3

Second Superseding Indictment.docx

COUNT TWO

Beginning on a date unknown but by on or about January 2010 continuing until present time, in the Eastern District of Washington and elsewhere, the

Defendants, [REDACTED]

[REDACTED]

ADAM BENJAMIN GOLDRING, [REDACTED], and

others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to commit certain money laundering offenses under 18 U.S.C. § 1956, as follows:

(1956(a)(1))

The Defendants named in this count: did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, and transactions involving the use of a financial institution which is engaged in and affects interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the property involved in the financial transactions represents the proceeds of some form of unlawful activity, knowing that the transactions are designed in whole or in part to

1 conceal and disguise the nature, the location, the source, the ownership, and the
2 control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C.
3 § 1956(a)(1)(B)(i); and
4

5
6 **(1956(a)(2))**

7 The Defendants named in this count: did transport, transmit, and transfer,
8 and attempt to transport, transmit, and transfer a monetary instrument and funds
9 from a place in the United States to and through a place outside the United States
10 with the intent to promote the carrying on of specified unlawful activity, that is,
11 conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§
12 841(a)(1), (b)(1)(A), and 846; in violation of 18 U.S.C. § 1956(a)(2)(A).
13
14

15 The Grand Jury further alleges this offense was committed during and in
16 furtherance of the conspiracy charged in Count One, above.
17

18 All in violation of 18 U.S.C. § 1956(h).
19

20 **COUNT THREE**

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

COUNT FOUR

[REDACTED],

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT FIVE

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16
17 **COUNT SIX**

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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6 [REDACTED]
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9 [REDACTED]
10 [REDACTED]

11 **COUNT SEVEN**

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18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 **COUNT EIGHT**

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 **COUNT NINE**

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

COUNT TEN

COUNT ELEVEN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT TWELVE

[REDACTED],

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT THIRTEEN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED],

[REDACTED] [REDACTED]

COUNT FOURTEEN

COUNT FIFTEEN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 846, [REDACTED]

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED],

1 [REDACTED], ADAM BENJAMIN GOLDRING,

2 [REDACTED],

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED] and, shall forfeit to the United

8 States of America, any property constituting, or derived from, any proceeds
9 obtained, directly or indirectly, as the result of such offense(s) and any property
10 used or intended to be used, in any manner or part, to commit or to facilitate the
11 commission of the offense(s).

12 If any forfeitable property, as a result of any act or omission of the
13 Defendants:

- 14 (a) cannot be located upon the exercise of due diligence;
- 15 (b) has been transferred or sold to, or deposited with, a third party;
- 16 (c) has been placed beyond the jurisdiction of the court;
- 17 (d) has been substantially diminished in value; or
- 18 (e) has been commingled with other property which cannot be divided
- 19 without difficulty;

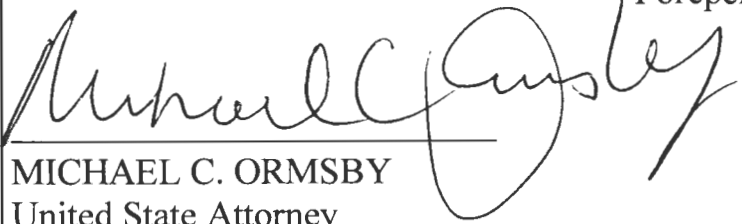
1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).
3

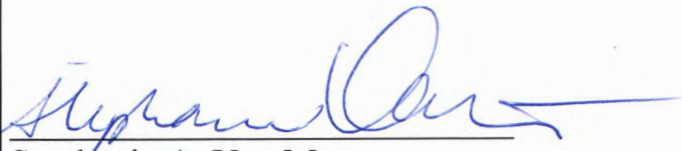
4 DATED this ____ day of December 2016.
5

6 A TRUE BILL

7 [REDACTED]
8

9 Foreperson

10 
11
12 MICHAEL C. ORMSBY
13 United State Attorney

14 
15
16 Stephanie A. Van Marter
17 Assistant United States Attorney